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THOMAS VINCENT GIRARDI

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS VINCENT GIRARDI,

Defendant.

Case No. 2:23-cr-47-JLS-1

**SUPPLEMENT TO EX PARTE  
APPLICATION TO CONTINUE  
TRIAL DATE FROM AUGUST 6,  
2024 TO OCTOBER 8 OR 15, 2024**

Tom Girardi, through counsel, submits this supplement to his recently filed Ex Parte Application to Continue the Trial Date from August 6 to October 8 or 15, 2024 (Docket No. 274).

Respectfully submitted,

CUAUHTEMOC ORTEGA  
Federal Public Defender

DATED: July 13, 2024

By */s/ Charles J. Snyder*

CHARLES J. SNYDER  
Attorney for Thomas Girardi

**DECLARATION OF CHARLES J. SNYDER**

I, Charles J. Snyder, declare as follows:

1. I am a California-licensed DFPD appointed to represent Tom Girardi in this matter. Unless otherwise stated, I make this declaration based on personal knowledge and, if called as a witness, would attest to its contents under oath.

2. At approximately noon today, I filed an ex parte application to continue the trial date in this matter from August 6, 2024 to October 8 or 15, 2024. Among many other things, in seeking a continuance of the trial date, I wrote: “[i]t is my understanding that the government has been meeting with witnesses in recent months and, for at least some of those meetings, we do not have reports or memoranda.” Docket No. 274 at 12:15-17. At 4:40 p.m. today, Saturday, the government made an additional discovery production. This production includes notes, reports, and documents from trial witnesses dated January 2023 (J.H., Kim Archie, Arin Scapa), April 2024 (Kim Cory (finalized April 16, 2024), Kathy Marlatt (finalized May 17, 2024), Isidro Bravo (finalized May 17, 2024)),<sup>1</sup> and May 2024 (Scapa (finalized May 17, 2024), J.H. (finalized June 20, 2024)). It also includes proffer letters signed by certain trial witnesses, which imply criminal exposure and constitute a benefit, dating back, in one case, to December 2022, and in two other cases, only for trial witnesses, to March of this year.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on July 13, 2024 at Los Angeles, California.

/s/ Charles J. Snyder

Charles J. Snyder

<sup>1</sup> For Marlatt and Bravo, we previously received nonfinal interview reports, but not notes or related documents. I have not had an opportunity to compare the older reports to the newer ones to see if there are any differences, or to review any of the recently-produced materials.